

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA
Plaintiff

v.

WENDEMAR ANDINO-ACEVEDO (27)
Defendant

Criminal No. 16-440 (PAD)

**INFORMATIVE MOTION REGARDING INTENT TO REQUEST VOLUNTARY
SURRENDER**

To the Honorable Pedro A. Delgado, District Judge:

COMES NOW Defendant, Wendemar Andino-Acevedo, through the undersigned attorney who respectfully alleges and prays as follows:

1. The sentencing hearing is set for tomorrow at 9:30 A.M.
2. Andino-Acevedo filed a sentencing memorandum which discusses at great length his positive equities and other reasons that the Court should take under advisement at sentencing under 18 U.S.C. sec. 3553(a).
3. As the sentencing memorandum and the Presentence Investigation Report state, Andino-Acevedo has complied with his conditions of pretrial release for almost 3 years. He has worked, carried on with his family life, and been a productive member of society. These facts are but the tip of the iceberg related to his potential to rehabilitate and leave behind his past mistakes. He also has concrete plans he intends to follow while in prison, and which are described in detail in his sentencing memorandum.
4. The imposition of less-restrictive imprisonment conditions for Andino-Acevedo will reduce known adverse impacts of incarceration, thus will conduce to better chances that Andino-

Acevedo will rehabilitate under custody, and will have better odds of reentering civilian life after serving his term of imprisonment.

5. For these reasons, Andino-Acevedo intends to request the benefit of self-surrender to a Bureau of Prisons institution. He informs the Court that he has the financial resources to do so, and has the track record of compliance with his conditions of pretrial release, thus making him a person who represents no flight risk.

WHEREFORE, it is respectfully requested from this Honorable Court to consider the arguments and facts presented in the present motion and grant the benefit of self-surrender after tomorrow's sentencing hearing.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, on November 13, 2019.

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record of all the parties in the instant case, and to the office of the United States Attorney.

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